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Attorneys for Plaintiff
FACEBOOK, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FACEBOOK, INC.,

Plaintiff,

v.

POWER VENTURES, INC. a Cayman Island
Corporation; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
DOES 2-25, inclusive,

Defendants.

Case No. 5:08-cv-05780-JW

**DECLARATION OF MORVARID
METANAT IN SUPPORT OF
FACEBOOK, INC.'S REPLY IN
SUPPORT OF MOTION TO
COMPEL THE PRODUCTION OF
DOCUMENTS AND DISCOVERY
RESPONSES FROM DEFENDANT
POWER VENTURES, INC.**

Date: October 24, 2011
Time: 9:00 a.m.
Judge: Hon. James Ware
Courtroom: 15, 18th Floor

1 I, Morvarid Metanat, hereby declare and state as follows:

2 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
3 of record to Facebook, Inc. in the above-captioned matter. I make this declaration based on my
4 personal knowledge, unless otherwise noted. If called, I can and will testify competently to the
5 matters set forth herein.

6 2. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts from the July
7 20, 2011 Deposition transcript of Steve Vachani. **[DESIGNATED HIGHLY CONFIDENTIAL**
8 **PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

9 3. Attached hereto as **Exhibit 31** is a true and correct copy of Non-Party Zak
10 Mandhro production document, bearing Bates Nos. ZM0298-325.

11 4. Attached hereto as **Exhibit 32** is a true and correct copy of Non-Party Zak
12 Mandhro production document, bearing Bates Nos. ZM0398-405.

13 5. Attached hereto as **Exhibit 33** is a true and correct copy of Non-Party Rob Pollock
14 production document, bearing Bates No. POLLOCK PRODUCTION 000065. **[DESIGNATED**
15 **HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED**
16 **UNDER SEAL]**

17 6. Attached hereto as **Exhibit 34** is a true and correct copy of Non-Party Rob Pollock
18 production document, bearing Bates No. POLLOCK PRODUCTION 000079. **[DESIGNATED**
19 **HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED**
20 **UNDER SEAL]**

21 7. Attached hereto as **Exhibit 35** is a true and correct copy of Non-Party Rob Pollock
22 production document, bearing Bates No. POLLOCK PRODUCTION 000095-96.
23 **[DESIGNATED HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—**
24 **LODGED UNDER SEAL]**

25 8. Attached hereto as **Exhibit 36** is a true and correct copy of Non-Party Rob Pollock
26 production document, bearing Bates No. POLLOCK PRODUCTION 000120. **[DESIGNATED**
27 **HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED**
28 **UNDER SEAL]**

9. Attached hereto as **Exhibit 37** is a true and correct copy of Non-Party Ed Niehaus's production document, bearing Bates Nos. NIEHAUS PRODUCTION 00051-55.

**[DESIGNATED HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—
LODGED UNDER SEAL]**

10. Attached hereto as **Exhibit 38** is a true and correct copy of an email from Monte Cooper to Tim Fisher, dated September 22, 2011.

11. Attached hereto as **Exhibit 39** is a true and correct copy of an email from Monte Cooper to Tim Fisher, dated September 14, 2011.

12. Attached hereto as **Exhibit 40** is a true and correct copy of a Defendant Power Ventures, Inc.'s Responses to Facebook, Inc.'s First Set of Requests for Production, dated December 15, 2010.

13. Attached hereto as **Exhibit 41** is a true and correct copy of a letter from Tim Fisher to Morvarid Metanat, dated May 31, 2011.

14. Attached hereto as **Exhibit 42** is a true and correct copy of Defendant Power Ventures, Inc.'s Responses to Facebook, Inc.'s Second Set of Request for Production, served on July 5, 2011.

15. Attached hereto as **Exhibit 43** is a true and correct copy of Defendant Steve Vachani's Response to Facebook, Inc.'s Second Set of Request for Production, served on July 5, 2011.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 28th day of September, 2011 at Menlo Park, California.

Dated: September 28, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Morvarid Metanat
MORVARID METANAT
Attorneys for Plaintiff
FACEBOOK, INC.